

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re:)
)
ASHLEY MARIE GJOVIK,) CHAPTER 7
) CASE NO. 25-11496-CJP
Debtor)

NOTICE OF CHAPTER 7 TRUSTEE'S INTENT TO ABANDON CLAIMS
(Roy Payne, 18 Worcester Home Owners Association and Charles Construction)

TO THE UNITED STATES TRUSTEE AND ALL OTHER PARTIES IN INTEREST:

PLEASE TAKE NOTICE that, pursuant to Section 554(a) of the United States Bankruptcy Code, Bankruptcy Rule 6007(a) and MLBR 6007-1, Mark G. DeGiacomo (the "Trustee"), the duly appointed Chapter 7 Trustee of the bankruptcy estate of Ashley Marie Gjovick (the "Debtor") intends to abandon his interest in all claims the Debtor has asserted or could assert against Roy Payne, 18 Worcester Home Owners Association and Charles Construction (the "Claims"). The Trustee has determined that the Claims have inconsequential value and benefit to the Debtor's bankruptcy estate. The Trustee will abandon the Claims unless a creditor or other party in interest files a written objection to the proposed abandonment with the Clerk's Office of the United States Bankruptcy Court, John W. McCormack Courthouse and Post Office, 5 Post Office Square, Boston, MA 02109, and serves a copy of such objection on the undersigned within fourteen (14) days of the mailing of this notice. Objections not timely filed and served may be deemed waived.

In support of this Notice, the Trustee states as follows:

1. On July 21, 2025, Ashley Marie Gjovik (the "Debtor") filed a voluntary petition pursuant to Chapter 7 of the Bankruptcy Code (the "Petition Date").
2. On July 22, 2025, the Trustee was appointed as the Chapter 7 Trustee of this bankruptcy estate.

3. The Debtor asserts several claims against Ron Payne, 18 Worcester Home Owners Association and Charles Construction (“the Potential Defendants”) which are related directly or indirectly to the rental of her current residence at 18 Worcester Square, Boston, MA (the “Apartment”).

4. On or about September 19, 2023, the Debtor, as lessee, entered into a lease for the Apartment.

5. The Debtor includes the following claims in the Schedules to her bankruptcy petition: “Landlord/tenant, real property, and/or false claims (Mass. General Laws Chapter 93A) litigation against Seeratt Dutt and Alex Matses (re: 18 Worcester Sq., Boston, MA). The conduct giving rise to the claim started in Sept. 2023 and is continuing, and also includes tort, personal injury, and criminal law claims. Includes civil claims against the building HOA or HOA Trustee, and/or Charles Construction” and “[claims] include a landlord/tenant, real property, premise liability, tortious, criminal, and/or false claims lawsuit against Seeratt Dutt and/or Alex Matses and/or Charles Corporation **[MARK – should Charles Corporation be Charles Construction – or is this the way she stated it]** regarding 18 Worcester Sq. Existing government cases covering misconduct occurring back to Sept. 2023 include Boston ISD Case No. 848-712, 849-279; Boston Fire Department Case (PRA needed), Boston Building Dept. Case (TBA); Boston Police Department (Report No. [redacted])”.

6. As of the date of the filing of this pleading, the Debtor continues to live in the Apartment.

7. Due to the nature of these claims, as well as the fact that at least some of the damages occurred post-petition, the Claims have no value to the bankruptcy estate.

If no objection to this Notice is timely filed, the Claims will be deemed abandoned. If an objection to this Notice is timely filed by a creditor or other party in interest, the Bankruptcy Court will schedule a hearing in connection therewith. In the event that a hearing is scheduled in connection with the proposed abandonment of the Claims, creditors and other parties in interest will receive notice of such hearing as the Court may direct.

MARK G. DEGIACOMO, CHAPTER 7
TRUSTEE OF THE BANKRUPTCY ESTATE OF
ASHLEY MARIE GJOVIK,

By his attorneys,

/s/ Mark G. DeGiacomo

Mark G. DeGiacomo, Esq. BBO #118170
Harris Beach Murtha Cullina PLLC
33 Arch Street, 12th Floor
Boston, MA 02110
617-457-4000 Telephone
617-482-3868 Facsimile
mdegiacomo@harrisbeachmurtha.com

Dated: September 22, 2025

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re:)
)
)
ASHLEY MARIE GJOVIK,) CHAPTER 7
) CASE NO. 25-11496-CJP
Debtor)
_____)

CERTIFICATE OF SERVICE

I, Mark G. DeGiacomo, hereby certify that on the 22nd day of September, 2025, I served a copy of the ***Chapter 7 Trustee's Intent to Abandon Claims*** via first-class mail, postage prepaid, ECF Transmission or by electronic mail upon the parties listed on the attached Service List.

/s/ Mark G. DeGiacomo
Mark G. DeGiacomo, Esq. BBO #1181
Harris Beach Murtha Cullina PLLC
33 Arch Street, 12th Floor
Boston, MA 02110
617-457-4000 Telephone
617-482-3868 Facsimile
mdegiacomo@harrisbeachmurtha.com

Richard King, Asst. U.S. Trustee*
Office of the US Trustee
J.W. McCormack P.O. & Courthouse
5 Post Office Sq., 10th Fl, Suite 1000
Boston, MA 02109

Aidvantage- U.S. Department of
Education
Attention: Bankruptcy Discharge
P.O. Box 9635
Wilkes-Barre, PA 18773

Boston Medical
Attention: Billing/Insolvency
One Boston Medical Center Place
Boston, MA 02118

U.S. Department of Education
Attention: Bankruptcy Discharge
400 Maryland Avenue, SW
Washington, DC 20202

JPMorgan Chase Bank, N.A.
s/b/m/t Chase Bank USA, N.A.
c/o National Bankruptcy Services, LLC
P.O. Box 9013
Addison, TX 75001

Ashley Marie Gjovik
18 Worcester Square, Apt. 1
Boston, MA 02118

Apple Inc
Attention; Apple Payment Services
10355 N. De Anza Blvd
Cupertino, CA 95014

Goldman Sachs Bank USA
Salt Lake City Branch
Lockbox 6112, P.O. Box 7247
Philadelphia, PA 19170

Aidvantage on behalf of The
Department of Education
PO Box 300001
Greenville, TX 75403

Andrew M. Troop, Esq.*
(Counsel to Apple Inc.)
Pillsbury Winthrop Shaw Pittman LLP
31 West 52nd Street
New York, NY 10019

Bank of America
Attention; Billing/Insolvency
PO Box 672050
Dallas, TX 75267

JPMorgan Chase Bank, N.A.
Mail Code LA4-7100
Monroe, LA 71203

Tremont Dental Care
Attention: Billing/Insolvency
635 Tremont St.
Boston, MA 02118

*served via ECF transmission